

IN THE UNITED STATES DISTRICT COURT OF NASHVILLE, TN

KENNETH ZEBLEY

V

CASE

AUDREY OSKIN

SHANNON CRUTCHER, ESQ

RECEIVED

DEC 10 2024

U.S. District Court

Middle District of TN

COMPLAINT FOR SLANDER

JURISDICTION

1) PURSUANT TO 28 USC 1331 "THE DISTRICT COURTS SHALL HAVE ORIGINAL JURISDICTION OF ALL CIVIL ACTIONS ARISING UNDER THE CONSTITUTION, LAW, OR TREATIES OF THE UNITED STATES."

PLAINTIFF, KENNETH ZEBLEY, IS A CITIZEN & RESIDENT OF NASHVILLE, TN AND HAS BEEN FOR MORE THAN SIX MONTHS PRIOR TO FILING OF THE COMPLAINT. THE ACTS COMPLAINED OF WERE COMMITTED IN TENNESSEE WHILE PLAINTIFF WAS A BONA FIDE RESIDENT OF MIDDLE TENNESSEE.

2) THE CO-DEFENDANTS ARE RESIDENTS & CITIZENS OF MIDDLE TENNESSEE AS WELL AS THE UNITED STATES.

SLANDER DEFINED & APPLIED

- 1) DEFINED AS DEFAMATION PUBLISHED BY BEING SPOKEN ALOUD.
PUBLICATION IS A TERM OF ART MEANING THE
COMMUNICATION OF DEFAMATORY MATTER TO A THIRD PERSON.
IN THE CASE OF SLANDER, "PUBLICATION" OCCURS WHEN
THE DEFAMATORY MATTER IS SPOKEN.

TO RECOVER FOR ORAL DEFAMATION OR SLANDER, ONE MUST
PROVE NOT ONLY THE MAKING OF A SLANDEROUS STATEMENT
BUT ALSO PUBLICATION OF THE SLANDER, WHICH OCCURS
WHEN THE SLANDER IS COMMUNICATED TO ANYONE
OTHER THAN THE PERSON SLANDERED. (KURTZ V WILLIAMS
188 GA APP 14 (3) 371 SE 2d 878 - 1988)

ISSUES & FACTS

- 2) ON OR ABOUT DECEMBER 2023, DEFENDANT CALLED CPS.
THE DEFENDANT MADE FALSE & MALICIOUS STATEMENTS
ABOUT PLAINTIFF TO CPS EMPLOYEES THAT THE PLAINTIFF
ABUSED HIS CHILDREN AND WAS A DRUG - ADDICTED
ALCOHOLIC.

PLAINTIFF IS A WAR VETERAN & AERONAUTICS PROFESSIONAL
WITH A DEGREE IN AERONAUTICAL SCIENCE & METEOROLOGY.

PLAINTIFF IS CURRENTLY ASSISTING VANDERBILT MEDICAL HOSPITAL
TRAUMA CENTER, FIREFLIGHTERS, AND EMS. PLAINTIFF IS A

RETIRED WAR VETERAN WITH AN HONORABLE DISCHARGE. PLAINTIFF
HAS NO CRIMINAL HISTORY AND HAS NO ALCOHOL
OR DRUG ISSUE.

LPS CONTACTED THE PLAINTIFF AND INFORMED MR. ZEBLEY OF
THE FALSE & MALICIOUS STATEMENTS MADE BY BOTH
~~THE~~ MS OSKIN AND MR. CRUTCHER. THE CO-DEFENDANTS
HAVE CONTACTED THE PLAINTIFF EMPLOYER TO SPREAD
MALICIOUS LIES AS WELL AS FAMILY & FRIENDS.

LPS PERFORMED RANDOM ALCOHOL & DRUG TEST ON
THE PLAINTIFF. LPS SEARCHED THE HOME & CONDUCTED
INTERVIEWS. THE PLAINTIFF TEST WERE NEGATIVE AND
LPS FOUND THE CLAIMS OF ABUSE TO BE FALSE.

SUBSEQUENTLY THE CO-DEFENDANTS HAVE RETALIATED AGAINST
THE PLAINTIFF FILING FALSE REPORTS OF STALKING.
THE CO-DEFENDANTS HAVE COMMITTED PERJURY AND EVEN
EXPOSED THE MINOR CHILDREN TO PORNOGRAPHIC AND
POTENTIAL CHILD PEDOPHILE IN THE HOME. THE CO-DEFENDANTS
CONTINUE TO HARASS THE PLAINTIFF.

HARM CAUSED

3) THE INTENTIONAL INFLECTION OF MENTAL ANGUISH AS A RESULT OF THE FALSE & MALICIOUS STATEMENTS HAS RUINED THE PLAINTIFFS DIGNITY. THE DEFENDANT CAUSED EMOTIONAL DISTRESS & MADE INTENTIONAL STRATEGIC CHOICES TO MAKE FALSE & MALICIOUS STATEMENTS TO EMPLOYERS, CPS, AND FAMILY CAUSING ISSUE WITH WORK & FAMILY.

THE SUPREME COURT STATED "WE HAVE EMPHASIZED, MOREOVER, THAT THE OBJECTIVE SEVERITY OF HARASSMENT SHOULD BE JUDGED FROM THE PERSPECTIVE OF A REASONABLE PERSON IN THE PLAINTIFF POSITION, CONSIDERING "ALL THE CIRCUMSTANCES" (HARRIS, SUPRA, AT 23 114 S. CT AT 371).

THE PLAINTIFF HAS HAD TO SEEK MEDICAL TREATMENT AND ANY REASONABLE CAN CONCLUDE THAT THE FALSE & MALICIOUS STATEMENTS MADE BY THE DEFENDANTS WERE MADE TO HARASS, INTIMIDATE, AND INJURE THE PLAINTIFFS, AND HIS DIGNITY.

THE CO-DEFENDANTS HAVE ATTEMPTED TO CONCEAL THEIR EGREGIOUS ACTS BY USING THE COLOR OF THE LAW. THE INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS HAS CAUSED TRAUMA TO THE PLAINTIFF & RUINED HIS REPUTATION AS A PILOT.

RELIEF & PRAYERS

1) THAT THIS COURT AWARD \$ 5,000,000.00 IN DAMAGES FOR
LOST WAGES, ACTUAL DAMAGES, PAIN & SUFFERING, & PUNITIVE DAMAGES.

2) THAT THIS COURT AWARD ALL COST OF LITIGATION STEMMING FROM
ON WITH THE DEFENDANTS INCLUDING BUT NOT LIMITED TO
COURT COST, ATTORNEYS FEES, MEDICAL TREATMENT, REHABILITATIVE
SERVICES, ETC

3) THAT THIS COURT ORDER A RULE 35 PSYCHOLOGICAL EVALUATION
ON THE DEFENDANTS.

4) THAT THIS COURT ORDER DAN OSKIN TO UNDERGO CHILD-PEDOPHILIA
TRAINING AND INPATIENT TREATMENT FOR EXPOSING HIS GENITALS
TO PLAINTIFFS CHILDREN, AND REMOVED FROM THE PRESENCE
OF THE CHILD(REN) UNTIL DEEMED SAFE - IF EVER.

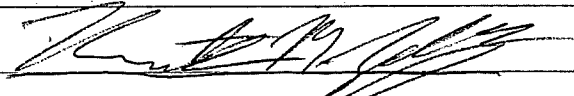
5) FOR ALL OTHER RELIEF DEEM PROPER

VERIFICATION

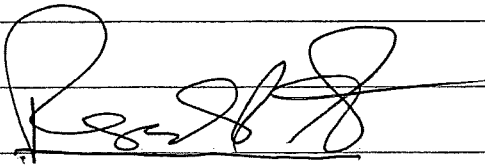
STATE OF TENNESSEE

COUNTY OF DAVIDSON

KENNETH M. ZEBLEY, AFTER FIRST BEING DULY SWORN, MAKES OATH THAT THE STATEMENTS CONTAINED IN HIS FORGOING "COMPLAINT" ARE TRUE TO THE BEST OF HIS ~~BE~~ KNOWLEDGE, INFORMATION, AND BELIEF AND THAT HE BRINGS THIS PETITION NOT OUT OF LEVITY OR BY COLLUSION WITH THE DEFENDANTS, BUT IN SINCERITY AND TRUTH, AND FOR THE CAUSES MENTIONED THEREIN.


KENNETH M. ZEBLEY

SWORN & SUBSCRIBED BEFORE ME ON THIS 4th DAY OF December



NOTARY PUBLIC

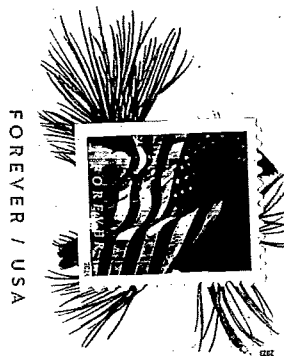
MY COMMISSION EXPIRES 10/4/27



Ken Zebley
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U.S. District Court
Middle District of TN



US DISTRICT COURT CLERK
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